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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as
successor in interest to BENJAMIN
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
MARISOL BARAJAS; HECTOR
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

Assigned to:

Hon Mark C. Scarsi
Hon. Mag. Judge Karen L. Stevenson

**DECLARATION OF HANG D. LE IN
SUPPORT OF PLAINTIFF'S
MOTIONS IN LIMINE NOS. 1-4**

Final Pretrial Conference:

Date: January 26, 2026
Time: 2:00 p.m.
Crtrm: 7C

Trial:

Date: February 10, 2026

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the United States
3 District Court for the Central District of California. I make this Declaration in
4 Support of Plaintiff's Motions in Limine Nos. 1-4. I have personally familiar with the
5 matters stated herein and could testify competently thereto if called.

6 2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the Rule 26
7 Report of County Defendants' human factors expert, Joel Suss, Ph.D.

8 3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant
9 portions of the Deposition of Joel Suss, Ph.D.

10 4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the Rule 26
11 Report of County Defendants' police practices expert, Edward T. Flosi.

12 5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant
13 portions of the Deposition of Edward T. Flosi.

14 6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the Rule 26
15 Report of County Defendants' rebuttal neurologist expert, John Marehbian, MD.

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17 I declare under penalty of perjury under the laws of the State of California and the
18 United States of America that the foregoing is true and correct. Executed this 5th day
19 of January 2026, in Los Angeles, California.

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